

MCKOOL SMITH
A PROFESSIONAL CORPORATION • ATTORNEYS
DALLAS, TEXAS

Charles M. Kagay – Cal. Bar No. 73377
SPIEGEL LIAO & KAGAY, LLP
388 Market Street, Suite 900
San Francisco, California 94111
Telephone: (415) 956-5959
Telecopier: (415) 362-1431
cmk@slksf.com

Martin C. Robson – Tex. Bar No. 24004892
Steven J. Pollinger – Tex. State Bar No. 24011919
Geoffrey L. Smith – Tex. State Bar No. 24041939
McKool Smith, P.C.
300 West Sixth Street, Suite 1700
Austin, Texas 78701
Telephone: (512) 692-8702
Telecopier: (512) 692-8744
mrobson@mckoolsmith.com
spollinger@mckoolsmith.com
gsmith@mckoolsmith.com

Attorneys for Plaintiff Visto Corporation

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

VISTO CORPORATION,
Plaintiff and Counterclaim-Defendant,
v.
RESEARCH IN MOTION LIMITED, and
RESEARCH IN MOTION CORPORATION
Defendants and Counterclaim-Plaintiffs.

Case No. CV-08-0031-MSC

Court of Original Jurisdiction:

Civil Action No. 2-06-CV-181-TJW(CE)
United States District Court For The Eastern
District of Texas - Marshall Division

**STIPULATION OF COUNSEL RE:
ADMINISTRATIVE MOTION TO FILE
PORTIONS OF DOCUMENTS UNDER
SEAL**

Date: April 23, 2008
Time: 9:30 a.m.
Judge: Magistrate Judge Larson

Pursuant to Local Rules 79-5, 7-11 and 7-12, Plaintiff Visto Corporation (“Visto Corporation”) and Defendants Research in Motion Limited and Research in Motion Corporation, by and through their respective counsel of record, hereby stipulate and agree as follows:

1. That selected portions of the following documents may be filed under seal:

- a. Visto Corporation’s Opposition to Google’s Motion to Quash Subpoena, or in the Alternative, For Protective Order, and Visto Corporation’s Cross-Motion to Compel Google to Comply with Third-Party Subpoena;
- b. Declaration of Martin C. Robson in Support of Visto Corporation’s Opposition to Google’s Motion to Quash Subpoena, or in the Alternative, For Protective Order, and Visto Corporation’s Cross-Motion to Compel Google to Comply with Third-Party Subpoena, including accompanying exhibits.

2. That upon obtaining Google Inc.’s agreement to abide by the Agreed Protect Order attached to the accompanying Declaration of Martin C. Robson, Visto Corporation may serve on Google Inc. unredacted versions of the above documents.

Dated: March 31, 2008.

Respectfully submitted,

/s/ Charles M. Kagay

Charles M. Kagay
California State Bar No. 73377
SPIEGEL LIAO & KAGAY, LLP
388 Market Street, Suite 900
San Francisco, California 94111
415.956.5959 (phone)
415.362.1431 (fax)
cmk@slksf.com

Steven J. Pollinger
Texas State Bar No. 24011919
spollinger@mckoolsmith.com
Geoffrey L. Smith
Texas State Bar No. 24041939
gsnith@mckoolsmith.com
MCKOOL SMITH, P.C.
300 West Sixth Street, Suite 1700
Austin, Texas 78701
Telephone: (512) 692-8702
Telecopier: (512) 692-8744

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Martin C. Robson
Texas State Bar No. 24004892
mrobson@mckoolsmith.com
McKool Smith, P.C.
300 Crescent Court, Suite 1500
Dallas, Texas 75201
Telephone: (214) 978-4000
Telecopier: (214) 978-4044

**ATTORNEYS FOR PLAINTIFF
VISTO CORPORATION**

/s/ Aaron Charfoos

Aaron Charfoos
Linda S. DeBruin
William E. Devitt
Michael A. Parks
KIRKLAND & EILLIS LLP
200 E. Randolph Street
Chicago, IL 60601
312.861.2000 (phone)
312.861.2200 (fax)

Eric H. Findlay
TX State Bar No. 07889886
RAMEY & FLOCK, P.C.
100 E. Ferguson, Suite 500
Tyler, TX 75702
ericf@rameyflock.com
903.597.3301 (phone)
903.597.2413 (fax)

Harry Lee Gillam, Jr.
TX State Bar No. 07921800
GILLAM & SMITH, LLP
110 S. Bolivar, Suite 204
Marshall, TX 75670
gil@gillamsmithlaw.com
903.934.8450 (phone)
903.934.9257 (fax)

Brian Rivers
Barbara Parvis
RESEARCH IN MOTION CORPORATION
102 Decker Court, Suite 180
Irving, TX 75062
972.650.4266 (phone)
972.650.2006 (fax)

Joe W. Redden, Jr.
BECK REDDEN & SECREST LLP
1221 McKinney Street, Suite 4500
Houston, TX 77010
713.951.3700 (phone)
713.951.3720 (fax)

ATTORNEYS FOR DEFENDANTS
RESEARCH IN MOTION LIMITED AND
RESEARCH IN MOTION CORPORATION

SPIEGEL LIAO & KAGAY, LLP

I, Charles M. Kagay, attest that concurrence
in the filing of the document has been
obtained from each of the other signatories.

/s/ Charles M. Kagay
Charles M. Kagay

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED:

United States Magistrate Judge